

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MOBILE PIXELS, INC.,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

Defendants.

Civil Action No.: 1:23-CV-12587-ADB

**DEFENDANT SHENZHEN CITY FREE VAST SCIENCE AND TECHNOLOGY CO.,  
LTD.'S MOTION FOR LEAVE FOR ATTORNEYS  
RUOTING MEN, TAO LIU, AND WEI WANG TO APPEAR PRO HAC VICE**

Pursuant to Local Rule 83.5.3, Defendant Shenzhen City Free Vast Science and Technology Co., Ltd. (d/b/a Maxfree) ("Maxfree") moves for leave for Attorneys Ruoting Men ("Men"), Tao Liu ("Liu") and Wei Wang ("Wang") to appear *pro hac vice* for the purpose of representing Maxfree in this action. As grounds for this motion, Maxfree states as follows:

1. This motion is presented to the Court by a member of the bar of this Court who has filed an appearance in this action.
2. Attorney Men is a member of the bar of the State of New York and various federal courts. Attorney Men has prepared an affidavit identifying the jurisdictions in which he is admitted to practice. Attorney Men's affidavit is incorporated herein by reference and attached hereto as Exhibit A.
3. Attorney Men is in good standing in the jurisdictions in which he is admitted to practice, and there are no disciplinary actions pending against him.
4. Attorney Men is familiar with the Local Rules of this Court.

5. Defendant Maxfree desires to have Attorney Men admitted to represent it in this action.

6. Attorney Liu is a member of the bar of the State New York and various federal courts. Attorney Liu has prepared an affidavit identifying the jurisdictions in which he is admitted to practice. Attorney Liu's affidavit is incorporated herein by reference and attached hereto as Exhibit B.

7. Attorney Liu is in good standing in the jurisdictions in which he is admitted to practice, and there are no disciplinary actions pending against him.

8. Attorney Liu is familiar with the Local Rules of this Court.

9. Defendant Maxfree desires to have Attorney Liu admitted to represent it in this action.

10. Attorney Wang is a member of the bar of the State of New York and various federal courts. Attorney Wang has prepared an affidavit identifying the jurisdictions in which he is admitted to practice. Attorney Wang's affidavit is incorporated herein by reference and attached hereto as Exhibit C.

11. Attorney Wang is in good standing in the jurisdictions in which he is admitted to practice, and there are no disciplinary actions pending against him.

12. Attorney Wang is familiar with the Local Rules of this Court.

13. Defendant Maxfree desires to have Attorney Wang admitted to represent it in this action.

14. Contemporaneous with this filing, Defendant Maxfree has made payment of the fee associated with this motion.

WHEREFORE, Defendant, Shenzhen City Free Vast Science and Technology Co., Ltd. (d/b/a Maxfree) respectfully requests that this Court admit attorneys Ruoting Men, Tao Liu, and Wei Wang *pro hac vice* for the purpose of representing it in this action.

Defendant,

SHENZHEN CITY FREE VAST SCIENCE AND TECHNOLOGY CO., LTD.,

By its attorneys,

/s/ Richard E. Briansky

Richard E. Briansky (BBO#632709)  
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Dated: December 1, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those parties which are as non-registered participants.

Date: December 1, 2023

/s/ Richard E. Briansky  
Richard E. Briansky

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1, on December 1, 2023 I contacted counsel for Plaintiff in this action with respect to the above Motion. Plaintiff's counsel represented that Plaintiff did not object to the Motion.

/s/ Richard E. Briansky  
Richard E. Briansky